



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

## MEMO ENDORSED

February 16, 2023

**By ECF**

The Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Thomas Santos, et al.*, S1 20 Cr. 481 (ER)**

Dear Judge Ramos:

After conferring with defense counsel, the Government understands that Adrean Coombs, a defendant in the above-referenced case, intends to enter a plea of guilty in this matter. The Government further understands that the Court and the defense are available on March 6, 2023, at 3:30 P.M. Accordingly, the Government respectfully requests that a change-of-plea proceeding be scheduled for that date and time.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney  
Southern District of New York

By: /s/  
Jarrod L. Schaeffer / Elizabeth A. Espinosa  
Assistant United States Attorneys  
Tel: (212) 637-2270 / 2216

cc: Counsel of Record (via ECF)

The change of plea hearing will be held on March 6, 2023 at 3:30 p.m.  
SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: 2/17/2023

New York, New York